

June 12, 2018

Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Waiver request – CC Docket Nos. 02-6

USAC Form 471 Cert Date: June 12, 2018
Form 471 Number: 181039871
Form 470 Numbers: 180025102
Funding Year: 2018-2019
Billed Entity Name: Detroit Public Library
BEN: 130943
FRNs: 1899083877
Service Provider: Merit Network Inc.
SPINs: 143004331

Contact Person: Victor Ibegbu

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Request for Waiver: Detroit Public Library (DPL) is asking for a waiver for 2018 filing window. Application could not be filed in window for the reasons below:

Form 471 was filed outside of window due to EPC technical problems.

Explanation: Multiple EPC system errors prevented Detroit Public Library from completing the 471 filing within the given window.

Background

Detroit Public Library made several attempts to file USAC 471 for 2018/2019 but was prevented by the system for multiple reasons. These issues were reported to technical support of USAC who acknowledged those to be system errors. Multiple cases were opened on this. The case numbers are: 231519, 231761 and 234052. These issues were later escalated to USAC system engineers but the error was not rectified until after the filing window was closed. We are asking for a waiver for our 471 application with number 181039871.

Summary of Appeal

After multiple attempts by March 22, 2018 to complete Detroit Public Library's 2018 Form 471, (Form 471 numbers: 181039715, 181041407, 181039871 and 181039562. See Attachment 1) DPL initiated a case with the technical support of USAC. The initial assigned case number was #231519. See Attachment 2.

On a follow-up on March 23, 2018, another case was opened for the same issue (Case number 231761. Please see Attachment 3). This time, the persistent error was an "Error Evaluating UI expression." See Attachment 1. We continued to experience these issues way past the March 28th update by USAC engineer.

DPL again followed up on this case and was informed that our issues had been escalated to USAC's systems engineers. Case number 234052 was assigned. See Attachment 4.

On June 11, 2018, DPL was notified by USAC's systems engineers that the issues were resolved. DPL subsequently completed the pending USAC Form 471 application #181039871.

Request

We ask that the Commission to grant us a waiver on our 2018 USAC Form 471 application with number 181039871 because of the EPC system error which prevented the Detroit Public Library from completing the process in the given window.

The inability to file our 2018 Form 471 was as result of USAC's EPC system error and no fault of Detroit Public Library. The denial of these funds will severely impact the library's finances and ability to deliver new technology services to our patrons.

We appreciate your time and consideration.

Sincerely,

(submitted electronically via ECFS)

Victor Ibegbu

Assistant Director for Information Systems, Detroit Public Library

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Attachments below:

Att 1 – DPL_EPC_Error_Screenshots_1

Att 2 - DPL_USAC_Case #231519_471_error

Att 3 - DPL_USAC_Case #231761_471_error

Att 4 - DPL_USAC_Case #234052_471_error